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6 **Attorneys for Plaintiffs**

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 VIRGINIA MITSCHKE, Individually, as  
surviving heir, and as Co-Administrator of the  
10 Estate of RICHARD DARNELL, Decedent,

11 Plaintiff,

12 vs.

13 GOSAL TRUCKING, LTD., a Canadian  
corporation; CANADIAN WESTERN  
BANK, a Canadian corporation; SAMIMI  
14 SAEED, Individually; DOES I through X;  
and ROE CORPORATIONS I through X,

15 Defendants.  
16

Case No. 2:14-cv-01099-JCM-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFFS TO  
FILE RESPONSE TO DEFENDANTS'  
MOTION FOR PROTECTIVE ORDER  
REQUESTING STAY OF HIS  
DEPOSITION AND DISCOVERY  
RESPONSES PENDING RESOLUTION  
OF HIS CRIMINAL TRIAL  
(DOCUMENT 082)**

**(SECOND REQUEST)**

17 VIRGINIA MITSCHKE ("Plaintiff"), by and through her counsel KAEMPFER  
18 CROWELL and Defendants GOSAL TRUCKING, LTD. and SAMIMI SAEED, by and  
19 through their counsel ALVERSON, TAYLOR, MORTENSEN & SANDERS, hereby  
20 respectfully submit this Stipulation And Order To Extend Time For Plaintiffs To File Response  
21 To Defendants' Motion For Protective Order Requesting Stay Of His Deposition And  
22 Discovery Responses Pending Resolution Of His Criminal Trial (Document 082) (Second  
23 Request) (the "Stipulation"). This Stipulation is made in accordance with LR 6-1, LR 6-2, and  
24 LR 7-1 of the Local Rules of this Court. This is the second request for an extension of time to

1 file Plaintiffs' Response To Defendants' Motion For Protective Order Requesting Stay Of His  
2 Deposition And Discovery Responses Pending Resolution Of His Criminal Trial (Document  
3 082) (Plaintiffs' "Response").

4 This Stipulation is entered into at the request of counsel for Plaintiff who respectfully  
5 represents that counsel has been working diligently and in good faith to meet the deadline for  
6 the filing of Plaintiff's Response, however, despite counsel's best efforts, additional time is  
7 needed for preparation of the Response. Plaintiffs' counsel is moving offices and one of the  
8 attorneys assigned to this matter is changing firms. Counsel for Defendants Samimi Saeed and  
9 Gosal Trucking, Ltd. have graciously agreed that they have no objection to the requested  
10 extension up to and including **June 19, 2015**, within which to file Plaintiff's Response.

11 This Stipulation is presented in good faith and not for the purpose of delay.

12 IT IS SO STIPULATED.

13 DATED this 12<sup>th</sup> day of June, 2015.

14 KAEMPFER CROWELL

15  
16 BY: /s/James E. Smyth II  
17 JAMES E. SMYTH II (Nevada Bar No. 6506)  
18 8345 West Sunset Road, Suite 250  
19 Las Vegas, Nevada 89113  
20 *Attorneys for Plaintiffs*

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1 DATED this 12<sup>th</sup> day of June, 2015.

2 ALVERSON, TAYLOR, MORTENSEN & SANDERS

3  
4 BY: /s/Sabrina G. Wibicki  
5 NATHAN R. REINMILLER, ESQ.  
6 SABRINA G. WIBICKI, ESQ.  
7 7401 W. Charleston Blvd.  
8 Las Vegas, NV 89117  
9 *Attorneys for Gosal Trucking, Ltd. and*  
10 *Saeed Samimi*

11 **ORDER**

12 IT IS SO ORDERED:

13 

14 UNITED STATES ~~DISTRICT COURT~~ JUDGE  
15 Magistrate


16 DATED this 15<sup>th</sup> day of June, 2015.

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that service of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFFS TO FILE RESPONSE TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER REQUESTING STAY OF HIS DEPOSITION AND DISCOVERY RESPONSES PENDING RESOLUTION OF HIS CRIMINAL TRIAL (DOCUMENT 082) (SECOND REQUEST)** was made this date by electronic means through the Court's CM/ECF program to each of the following:

Nathan R. Reinmiller, Esq.  
Sabrina G. Wibicki, Esq.  
ALVERSON, TAYLOR,  
MORTENSEN & SANDERS  
7401 W. Charleston Blvd.  
Las Vegas, NV 89117  
*Attorneys for Gosal Trucking, Ltd.  
and Saeed Samimi*

DATED this 17<sup>th</sup> day of June, 2015.

  
an employee of Kaempfer Crowell